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WILLIAMS**

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AUG 27 2001

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

1900 K STREET, N.W.  
WASHINGTON, D.C. 20006-1109

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FILE NO: 46001.000278

August 27, 2001

**By Hand**

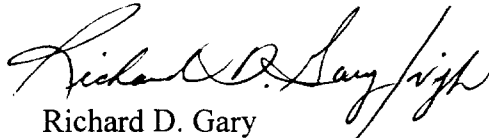
Ms. Magalie R. Salas  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

***WorldCom, Cox, and AT&T ads. Verizon***  
**CC Docket Nos. 00-218, 00-249, and 00-251**

Dear Ms. Salas:

Enclosed for filing on behalf of Verizon VA, please find four copies of Verizon Virginia Inc.'s Objection to Cox Virginia Telecom Inc.'s First Set of Discovery Requests.

Sincerely,



Richard D. Gary

**Enclosures**

cc: Dorothy T. Attwood (8 copies)(by hand)  
David Levy, Esq.  
Mark A. Keffer, Esq.  
J.G. Harrington, Esq.

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J.G. Harrington, Esquire  
August 27, 2001  
Page 2

bcc: David. K. Hall, Esquire  
Lydia R. Pulley, Esquire  
Karen Zacharia, Esquire  
Eric F. Reed, Esquire  
John F. Nestor  
Kelly L. Faglioni, Esquire  
Audrey B. Rusteau  
Dan W. Long, Esquire  
Stephanie Baldanzi, Esquire  
David Levy, Esquire

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AUG 27 2001

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
Petition of WorldCom, Inc. Pursuant )  
to Section 252(e)(5) of the )  
Communications Act for Expedited )  
Preemption of the Jurisdiction of the ) CC Docket No. 00-218  
Virginia State Corporation Commission )  
Regarding Interconnection Disputes )  
with Verizon Virginia Inc., and for )  
Expedited Arbitration )

In the Matter of )  
Petition of Cox Virginia Telecom, Inc. )  
Pursuant to Section 252(e)(5) of the )  
Communications Act for Preemption ) CC Docket No. 00-249  
of the Jurisdiction of the Virginia State )  
Corporation Commission Regarding )  
Interconnection Disputes with Verizon )  
Virginia Inc. and for Arbitration )

In the Matter of )  
Petition of AT&T Communications of )  
Virginia Inc., Pursuant to Section 252(e)(5) ) CC Docket No. 00-251  
of the Communications Act for Preemption )  
of the Jurisdiction of the Virginia )  
Corporation Commission Regarding )  
Interconnection Disputes With Verizon )  
Virginia Inc. )

**VERIZON VIRGINIA INC.'S OBJECTIONS  
TO WORLDCOM'S SECOND SET OF DATA REQUESTS**

In accordance with the Procedures Established for Arbitration of Interconnection  
Agreements Between Verizon and AT&T, Cox and WorldCom, CC Docket Nos. 00-218, 00-  
249, 00-251, DA 01-270, Public Notice (CCB rel. February 1, 2001), Verizon Virginia Inc.  
("Verizon") objects as follows to the Second Set of Data Requests served on Verizon by  
WorldCom on August 22, 2001.

## **GENERAL OBJECTIONS**

1. Verizon objects to WorldCom's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek information that is neither relevant to this case nor likely to lead to the discovery of admissible evidence, or otherwise seek to impose upon Verizon discovery obligations beyond those required by 47 CFR § 1.311 et seq.

2. Verizon objects to WorldCom's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, are overly broad, unduly burdensome or vague.

3. Verizon objects to WorldCom's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek information relating to operations in any territory outside of Verizon Virginia Inc. territory.

4. Verizon objects to WorldCom's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek information that is confidential or proprietary to a customer, CLEC or other third party. Verizon has an obligation to safeguard such information from disclosure. Thus, while Verizon may be in possession of such information, it does not have the authority to disclose that information to WorldCom or any other entity.

## **SPECIFIC OBJECTIONS**

In addition to the foregoing General Objections and without waiver of same, Verizon objects specifically to WorldCom's Data Requests as follows:

### **DATA REQUESTS**

2. Does any CLEC deploy direct end office trunks between a Verizon end office and the CLEC's point-of-interconnection ("POI") where the monthly traffic is less than 200,000 minutes of use per month? If yes, please provide details regarding the location of the trunk(s), the identity and location of each relevant CLEC POI and Verizon end office, and the traffic volumes between the Verizon end office(s) and the CLEC's point(s)-of-interconnection.

OBJECTION: See General Objections 1-3.

3. Please identify all telecommunications carriers that use Verizon tandem switches as a means of indirect interconnection with other telecommunications carriers.

OBJECTION: See General Objections 1-3.

4. Does Verizon provide settlement services, such as ITORP arrangements, for any telecommunications carriers in Virginia?

OBJECTION: See General Objections 1-3.

5. Does Verizon-Virginia pay reciprocal compensation to terminating carriers on behalf of any other telecommunications carriers, including affiliates of Verizon-Virginia, that originate traffic for which Verizon-Virginia provides transit service? If so, please provide an explanation of the arrangements.

OBJECTION: See General Objections 1-3.

6. Please identify all local exchange carriers throughout the Verizon footprint, including but not limited to CLECs and ITCs, with which Verizon has established a mid-span fiber meet point interconnection.

OBJECTION: See General Objections 1-4.

13. Please provide the most recent financial analysis that Verizon has performed regarding the deployment of GR-303.

OBJECTION: See General Objections 1-3.

14. Has Verizon deployed any GR-303 NGDLC in Virginia (include all tests of GR-303 NGDLC and any projects where it has been utilized)? If so, what percentage of the IDLC deployed in Virginia by Verizon is deployed in GR-303 mode?

OBJECTION: See General Objections 1-3.

15. Please provide the percentage of IDLC deployed by Verizon in Virginia.

OBJECTION: See General Objections 1-3.

16. Please provide the percentage of UDLC deployed by Verizon in Virginia.

OBJECTION: See General Objections 1-3.

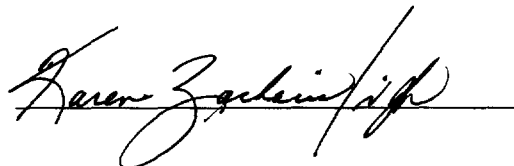
17. Please provide a specific description of the uses for which Verizon deploys UDLC in Virginia (including, for example, whether Verizon deploys UDLC for its own use, for CLEC use, etc.).

OBJECTION: See General Objections 1-3.

18. Has Verizon experienced any known incidents of clip-on fraud in Virginia? If so, please provide the number of verified, confirmed, cases of clip-on fraud, and the average loss of revenue per customer that Verizon has experienced as a result of these cases of clip-on fraud.

OBJECTION: See General Objections 1-3.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Karen Zachary", is written over a horizontal line.

Michael E. Glover  
Of Counsel

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Of Counsel

Dated: August 27, 2001

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Attorneys for Verizon



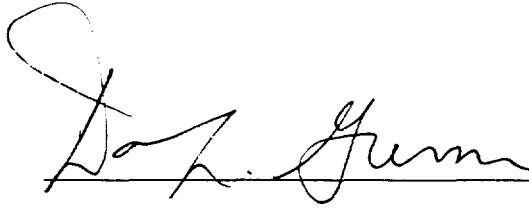
CERTIFICATE OF SERVICE

I do hereby certify that true and accurate copies of the foregoing Objections to WorldCom's Second Set of Data Requests were served electronically and by hand this 27th-day of August, 2001, to:

Jodie L. Kelley  
Jenner & Block LLC  
601 Thirteenth Street, N.W.  
Washington, D.C. 20005

and

Kimberly Wild  
WorldCom, Inc.  
1133 19th Street, N.W.  
Washington, D.C. 20036

A handwritten signature in black ink, appearing to read "David L. Gurn", is written over a horizontal line.